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Attorneys for Defendant Fresno Police Officer Rey Medeles

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

CHI THANH NGO) CASE NO.: 1:24-cv-0472-KES-BAM
)
Plaintiff,) STIPULATION AND Proposed ORDER
) TO EXTEND NON-EXPERT DISCOVERY
vs.) AND STAY THE CIVIL ACTION
) DURING THE PENDING CRIMINAL
FRESNO POLICE OFFICER MANUEL) ACTION
ROMERO; FRESNO POLICE OFFICER REY)
MEDELES; FRESNO POLICE OFFICER)
GUSTAVO GUTIERREZ, THE CITY OF) Complaint: April 21, 2024
FRESNO; UNKNOWN LAW) Trial Date: September 22, 2026
ENFORCEMENT OFFICERS)
)
Defendants.)

IT IS HEREBY STIPULATED by and between Plaintiff Chi Thanh Ngo (“Plaintiff”) and Defendants Former Fresno Police Officer Rey Medeles (“Medeles”), Fresno Police Officer Manuel Romero (“Romero”), and the City of Fresno (“Defendants”) (collectively “the Parties”), through their respective counsel of record, as follows:

GOOD CAUSE STATEMENT

1. The non-expert discovery deadline is currently set for December 15, 2025.
2. The Parties met and conferred as a result of the Ex Parte application filed by Plaintiff to extend the discovery cutoff (Doc. No. 29), in an effort to resolve the issues raised in the Ex Parte, as well as to address the recent arrest of Medeles, and to respond to the minute order

1 filed on December 16, 2025 (Doc. No. 31).

2 3. Medeles was arrested in early October 2025 on charges of grand theft and
3 preparing false evidence in *People of the State of California v. Rey Ariel Medeles*, Fresno County
4 Superior Court Case No. F25907039, which arises from accusations that Medeles stole money
5 from the police evidence locker. A pre-preliminary hearing in the case is currently set for March
6 2, 2026.

7 4. Medeles has a powerful incentive to invoke his Fifth Amendment right from
8 compelled self-incrimination with regard to any deposition or trial testimony. Full testimony
9 from Medeles would be important to each of the parties' respective police practices experts in
10 forming their opinions. The police practices expert for Medeles would additionally require
11 discussion with Medeles to properly form opinions.

12 5. Many of the officers whose depositions Plaintiff noticed, including defendants
13 Romero and Gutierrez, will also likely have to testify as part of the criminal trial.

14 6. The Parties have conducted extensive written discovery so far in this action and
15 the parties have all noticed and re-noticed depositions in an effort to accommodate availability of
16 counsel and their clients. The previously noticed depositions were removed from calendar so the
17 parties could pursue mediation on November 22, 2025, with the intention of coordinating
18 schedules to reset the depositions if the mediation was unsuccessful.

19 7. The mediation on November 22, 2025 was unsuccessful. On December 15, 2025,
20 Plaintiff's counsel—Kevin Little—represented that he had been in trial in Kern County from
21 November 24, 2025 through December 12, 2025.

22 8. As this matter is factually similar to and involves the same witnesses as Eastern
23 District of California Case Nos. 1:24-cv-00472-KES-BAM (*Chi Thanh Ngo v. City of Fresno, et.*
24 *al.*), and 1:23-cv-01471-JLT-SKO (*Luis F. Rodriguez v. City of Fresno, et. al.*), the Parties have
25 agreed to depose the above-identified only once each across all three of these matters.

26 9. As such, the Parties jointly stipulate and respectfully request that this Court modify
27 the existing Scheduling Order as specified below, or to a date as soon thereafter as is convenient
28 for the Court.

10. This is the third request by the Parties for an Order to modify the existing Scheduling Order.

STIPULATION

NOW, THEREFORE, in light of the foregoing Good Cause, the Parties hereby stipulate and respectfully request a modification of the Court's Order Continuing Discovery Cutoff Dates (Doc. No. 27) and the Order Granting in Part and Denying in Part Stipulation and Joint Request for an Order Continuing Trial and Trial Related Dates (Doc. No. 25), as follows:

1. The Non-Expert Discovery Deadline currently set for December 15, 2025, is continued by six months to June 15, 2026, except as to Defendants Rey Medeles, Gustavo Gutierrez, and Manuel Romero for whom the Non-Expert Discovery Deadline is stayed pending the conclusion of the criminal matter *People of the State of California v. Rey Ariel Medeles*, Fresno County Superior Court Case No. F25907039.

2. The remaining dates set forth in the Order Continuing Discovery Cutoff Dates (Doc. No. 27) and the Order Granting in Part and Denying in Part Stipulation and Joint Request for an Order Continuing Trial and Trial Related Dates (Doc. No. 25), including expert disclosures, are vacated and will be stayed pending the conclusion of the criminal matter *People of the State of California v. Rey Ariel Medeles*, Fresno County Superior Court Case No. F25907039.

3. A Status Conference be scheduled on June 19, 2026, or as soon thereafter as the Court and parties are available, to evaluate the appropriateness of setting a Scheduling Conference depending on the status of the underlying criminal case.

4. A Joint Status Conference Statement will be electronically filed by the parties 7 days prior to the Status Conference date and will be emailed in Word format to the Magistrate Judge assigned to the case.

Dated: December 19, 2025

WEAKLEY & ARENDT
A Professional Corporation

By: /s/ Brande L. Gustafson
James D. Weakley
Brande L. Gustafson
Attorneys for Defendant Rey Medeles

1 Dated: December 19, 2025

2 MANNING & KASS,
3 ELLROD, RAMIREZ, TRESTER LLP

4 By: /s/ Maya R. Sorensen
5 Mildred K. O'Linn
6 Maya R. Sorensen
7 Attorneys for Defendants Fresno Police
8 Officer Manuel Romero and City of Fresno

9 Dated: December 19, 2025

10 LAW OFFICE OF KEVIN G. LITTLE

11 By: Kevin G. Little
12 Kevin G. Little
13 Attorneys for Plaintiff Chi Thanh Ngo
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ORDER

THE PARTIES HAVING SO STIPULATED, and good cause appearing therefore, the Court hereby orders that the Scheduling Conference Order be modified as follows:

1. The Non-Expert Discovery Deadline currently set for December 15, 2025, is continued by six months to June 15, 2026, except as to Defendants Rey Medeles, ~~Gustavo Gutierrez~~, and Manuel Romero for whom the Non-Expert Discovery Deadline is stayed pending the conclusion of the criminal matter *People of the State of California v. Rey Ariel Medeles*, Fresno County Superior Court Case No. F25907039.

2. The remaining dates set forth in the Order Continuing Discovery Cutoff Dates (Doc. No. 27) and the Order Granting in Part and Denying in Part Stipulation and Joint Request for an Order Continuing Trial and Trial Related Dates (Doc. No. 25), including expert disclosures, are vacated and will be stayed pending the conclusion of the criminal matter *People of the State of California v. Rey Ariel Medeles*, Fresno County Superior Court Case No. F25907039.

3. A Status Conference is set for **June 23, 2026**, at **9:00 a.m.** in Courtroom 8 before the Magistrate Judge assigned to the case. The parties SHALL file a Joint Status Conference Statement by no later than June 16, 2026.

4. Counsel have neither identified that defendant Gustavo Gutierrez is included as a party to this stipulation nor included this defendant as a signatory to the stipulation. The stipulation as to defendant Gustavo Gutierrez is denied without prejudice.

IT IS SO ORDERED.

Dated: **December 22, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE